

**Commonwealth of Kentucky
Division for Air Quality**

RESPONSE TO COMMENTS

ON THE CONDITIONAL MAJOR DRAFT PERMIT F-06-045

U.S. Smokeless Tobacco Manufacturing Company

1600 North Main Street

Hopkinsville, Kentucky 42240

January 30, 2007

Martha M. Allman, Reviewer

SOURCE ID: 021-047-00055

AGENCY INTEREST #: 794

ACTIVITY ID: APE20060002

SOURCE DESCRIPTION:

A renewal operating permit application was received from U. S. Smokeless Tobacco Manufacturing Company (USSTMC) on July 20, 2006. A draft permit was issued on November 16, 2006. On December 4, 2007, USSTMC advised the Division that a new 1750 kW emergency generator would be installed.

A new federal regulation, 40 CFR 60 Subpart IIII, "Standards of Performance for Stationary Compression Ignition Internal Combustion Engines", was published in the Federal Register on July 11, 2006. This regulation applies to various compression ignition (CI) internal combustion engines (ICE) depending upon size of the engine, date of manufacture, and purpose. The Division requested additional information to determine whether 40 CFR 60 Subpart IIII would be applicable to the new generator. The response was received on January 9, 2007, and indicated that the new generator was actually obtained in 1999 and was first put into operation in an affiliate's facility in Franklin Park, Illinois. Therefore, Subpart IIII does not apply to this unit, since it applies to engines manufactured after April 1, 2006. This generator has been added to the permit and shall be subject to 500 hours of operation within any 12 consecutive months in order to ensure its status as an emergency generator and to ensure that total emissions remain less than that of a major source.

PUBLIC AND U.S. EPA REVIEW:

On November 22, 2006, the public notice on availability of the draft permit and supporting material for comments by persons affected by the plant was published in *Kentucky New Era*. The public comment period expired 30 days from the date of publication. Comments were received from USSTMC on December 4, 2006. Attachment A to this document lists the comments received and the Division's response to each comment. Minor changes were made to the permit as a result of the comments received, however, in no case were any emissions standards, or any monitoring, recordkeeping or reporting requirements relaxed. Please see Attachment A for a detailed explanation of the changes made to the permit.

ATTACHMENT A

Response to Comments

Response to comments received on December 4, 2006 from Mr. Karl Boldt with USSMTC.

Comment:

"On page 8, Section 2.a. states that particulate emissions shall not exceed 12.0 lbs./hr. I believe this should be 6.34 lbs.hr. (5,000 lbs./hr. production rate)."

Division's Response:

The Division concurs and this typographical error has been corrected.

Comment:

"On page 10, Section 2.a states that particulate emissions shall not exceed 12.0 lbs./hr. I believe this should be 16.8 lbs./hr. (24,000 lbs./hr. production rate)."

Division's Response:

The Division concurs that the 12.0 lbs./hr. was in error, but disagrees that the correct limit is 16.8 lbs./hr., but rather should be 16.76 lbs./hr. (rounding differences).

Comment:

"On page 12, Section 2.a. states that particulate emissions shall not exceed 12.0 lbs./hr. I believe this should be 19.5 lbs.hr. (two independent parallel processing lines each with a maximum production rate of 10,000 lbs./hr. and each with a particulate emission limitation of 9.74 lbs./hr.)"

Division's Response:

The Division concurs that the 12.0 lbs./hr. was in error, but disagrees that it is appropriate to arrive at an emission limit as the sum of the two limits. Instead, the permit has been clarified that the 9.74 lbs./hr. emission limit applies to each of the two processing lines.